

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

N.S. obo W.F.,

Case No. 1:23-cv-448

Plaintiff,

Hon. Paul L. Maloney

Magistrate Judge Phillip J. Green

v.

STURGIS PUBLIC SCHOOLS,

Defendant.

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**STIPULATION AND ORDER EXTENDING TIMELINES**

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiff and Defendant that the following deadlines in the Case Management Order (ECF No. 13) and the Stipulation and Order Extending Time for Parties to Disclose Expert Witnesses (ECF No. 21) shall be extended:

- Plaintiff's disclosure of expert witnesses pursuant to Rule 26(a)(2)(A) is extended from January 22, 2024, to March 15, 2024.
- Defendant's disclosure of expert witnesses pursuant to Rule 26(a)(2)(A) is extended from February 2, 2024, to April 12, 2024.
- Plaintiff's expert report deadline pursuant to Rule 26(a)(2)(B) is extended from February 16, 2024, to March 15, 2024.
- Defendant's expert report deadline pursuant to Rule 26(a)(2)(B) is extended from March 15, 2024, to April 12, 2024.
- The rebuttal report deadline is extended from March 29, 2024, to April 26, 2024.

- The completion of discovery deadline is extended from April 26, 2024, to May 31, 2024.
- The dispositive motion deadline is extended from May 28, 2024, to July 9, 2024.

The Parties respectfully request this additional time as Plaintiff is still waiting on necessary discovery responses from Defendant, which are voluminous. Plaintiff's experts cannot complete their work until such discovery is received. Defendant expects to get the discovery to Plaintiff by Friday, February 9, 2024.

No Party will be prejudiced by extending the deadlines in this matter.

**IT IS SO STIPULATED** on January 30, 2024.

s/Elizabeth K. Abdnour

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*Attorneys for Defendants*

**IT IS SO ORDERED.**

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Hon. Paul L. Maloney  
U.S. District Court Judge

Dated: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I, Elizabeth K. Abdnour, counsel for Plaintiff, certify that on January 30, 2024, I filed this Notice by use of this Court's ECF system, which will serve copies to all counsel of record.

/s/ Elizabeth K. Abdnour